

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

ROBIN FORD,

INDEX NO.:

Plaintiff(s),

DATE FILED:

-against-

THE CITY OF NEW YORK and NEW YORK CITY
POLICE DEPARTMENT,

Defendants

SUMMONS

TO THE ABOVE NAMED DEFENDANT(S) X

The basis of venue is:
Where the cause of action
arose.

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: New York, New York
June 6, 2014

ANREDER & GEORGE, ESQS.
Attorneys for Plaintiff

by:

Scott Anreder, Esq.
143 West 29th Street
Suite 1104
New York, New York 10001
(212) 967-2011

Defendant's Address:

THE CITY OF NEW YORK
100 Church Street
New York, NY 10007

NEW YORK CITY POLICE DEPARTMENT
1 Police Plaza
New York, NY 10038

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

=====X
ROBIN FORD,

Plaintiff(s),

-against-

THE CITY OF NEW YORK, and NEW YORK CITY
POLICE DEPARTMENT,

Defendant(s)

Index No.:
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**VERIFIED
COMPLAINT**

Plaintiff, by her attorneys, ANREDER & GEORGE, ESQS, as and for her Verified
Complaint, at all times hereinafter mentioned, upon information and belief, alleges:

AS AND FOR A FIRST CAUSE OF ACTION

1. That at all of the times hereinafter alleged, the plaintiff, ROBIN FORD, was and is a resident of the County of Kings, City and State of New York.
2. That at all times hereinafter alleged, and upon information and belief, the defendant, THE CITY OF NEW YORK, was and still is a public authority duly constituted and existing under and by virtue of the laws of the State of New York.
3. That at all times hereinafter alleged, and upon information and belief, the defendant, THE CITY OF NEW YORK, was a municipal corporation duly organized and existing under and by virtue of the Laws of the State of New York.
4. That at all times hereinafter alleged, and upon information and belief, the defendant, NEW YORK CITY POLICE DEPARTMENT, was and still is a public authority duly constituted

and existing under and by virtue of the laws of the State of New York.

5. That at all times hereinafter alleged, and upon information and belief, the defendant, NEW YORK CITY POLICE DEPARTMENT, was and still is a municipal corporation duly organized and existing under and by virtue of the Laws of the State of New York.
6. That at all times hereinafter alleged, and upon information and belief, the defendant, NEW YORK CITY POLICE DEPARTMENT, was and still is an agency of the defendant, THE CITY OF NEW YORK.
7. That on or about April 3, 2013, a Notice of Claim was served on the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, prior to the commencement of this action.
8. That on or about April 3, 2013, the plaintiff, herein duly presented in writing to the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, the claim for damages herein set forth and upon which this action is founded and that said claim was presented for adjustment.
9. That more than 30 days have elapsed since the said Notice of Claim was served upon the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, and the defendants have failed and refused to make adjustment of any claim set forth.

10. That a hearing pursuant to Section 50(h) of the General Municipal Law was held on July 15, 2013.

11. That all conditions precedent to the bringing of this action have been complied with.
12. That this action was commenced within one year and ninety (90) days after the accrual of the cause of action herein.
13. That at all times at all of the times hereinafter alleged, and upon information and belief, the subject police officers acted within the scope of their duties as employees, agents and officials of the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT.
14. That at all times hereinafter alleged, and upon information and belief, the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, employed various personnel including the police officers, law enforcement agents, employees and personnel mentioned in this Complaint.
15. That at all times hereinafter alleged, and upon information and belief, the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, employed various personnel including law enforcement agents and officials, police officers, jailers, warrant officers, wardens, magistrates, court attendants, clerks, corrections department personnel, district attorneys, assistant district attorneys and others hereinbelow referred to.
16. That on or about March 9, 2013, the plaintiff, ROBIN FORD, was arrested by the defendants, their agents, servants and/or employees.
17. That on or about March 9, 2013, the plaintiff, ROBIN FORD, was arrested by the defendants, their agents, servants and/or employees at or near the premises located at 24 Putnam

Avenue, County of Kings, City and State of New York.

18. That the aforesaid arrest and subsequent detention were without probable cause or any justification and was further based upon the defendants, their agents, servants and/or employees perjured testimony, false statements, falsified reports and documents and falsified evidence.

19. As a result of their concerted, unlawful, malicious and false arrest of the plaintiff, ROBIN FORD, the defendants, by their agents, servants and/or employees, placed the plaintiff under arrest, deprived plaintiff of her liberty without due process of law and confined and incarcerated the plaintiff against her will.

20. As a result of their concerted, unlawful, malicious and false arrest of the plaintiff, ROBIN FORD, the defendants intentionally, or with deliberate indifference and callous disregard of plaintiff's rights, placed the plaintiff under arrest, deprived plaintiff of her liberty without due process of law and confined and incarcerated the plaintiff against her will.

21. That as a result of the false arrest which the plaintiff suffered, plaintiff's health was impaired, plaintiff suffered great mental distress, plaintiff was incarcerated for more than three (3) days, plaintiff's reputation and character were injured, plaintiff's earning power was permanently impaired and large sums of money were expended by plaintiff in her defense of the criminal charges.

22. That by reason of the foregoing, the plaintiff, ROBIN FORD, was damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction

AS AND FOR A SECOND CAUSE OF ACTION

23. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 22 inclusive, with the same force and effect as though more fully set forth at length herein

24. That subsequent to the aforesaid false arrest, the plaintiff, ROBIN FORD, was held in custody against her will for a period of greater than three (3) days.

25. That the aforesaid detention and incarceration was the result of a false and illegal imprisonment, which plaintiff, ROBIN FORD, was caused to suffer for a period of greater than three (3) days.

26. That as a result of the detention which the plaintiff suffered, plaintiff's health was impaired, plaintiff suffered great mental distress, plaintiff's reputation and character were injured, plaintiff's earning power was permanently impaired and large sums of money were expended by plaintiff in her defense of criminal charges.

27. That by reason of the foregoing, the plaintiff, ROBIN FORD, was damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction

AS AND FOR A THIRD CAUSE OF ACTION

28. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 27 inclusive, with the same force and effect as though more fully set forth at length herein

29. That at the times of the above-stated false arrest and false imprisonment and

further at all times hereinafter mentioned, plaintiff, ROBIN FORD, was assaulted and battered.

30. That at the time of said false arrest, false imprisonment, assault and battery, the defendants were acting in the course and general scope of their employment duties and official duties pursuant to the authority given them by the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT.

31. That the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, at the time of the above-stated incident herein knew, should have known and had reason or opportunity to know, that the subject agents, servants and/or employees were unfit for the employment which they were hired, unfit for the official duties delegated to them and unfit for the law enforcement responsibilities to which they were assigned.

32. That by hiring, training, retaining, employing, failing to supervise and failing to investigate the aforesaid agents, servants and/or employees, the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, herein negligently created and caused a situation where it was likely that said agents, servants and/or employees would, as a result of their work history, unfit character, malicious temperament, criminal propensity and inadequate supervision, thereat, assault, batter, strike, unlawfully arrest, unlawfully imprison and unlawfully deprive innocent persons of their liberty, without sufficient reasons or probable cause appearing therefore.

33. That the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, knew or had reason or opportunity to know, in the exercise of due and reasonable care, that the aforesaid agents, servants and/or employees were vicious, potentially dangerous, negligent, and performing criminal and illegal acts during the course of their employment duties.

34. That the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, were negligent in the hiring, employment, training, retention and supervision of the aforesaid subject agents, servants and/or employees.

35. That by reason of and in consequence of said negligence and lack of reasonable care on the part of the defendants, THE CITY OF NEW YORK and NEW YORK CITY POLICE DEPARTMENT, and their agents, servants and/or employees, the plaintiff, ROBIN FORD, herein sustained serious bodily injuries with accompanying pain and was rendered sick, sore and bruised, and sustained a severe mental and nervous shock to her system, that some of the said injuries may be permanent; that she was imprisoned, incarcerated, confined and detained against her will for more than three (3) days; that she was deprived of her liberty, rights and freedom for more than three (3) days; and as a result thereof, plaintiff has been confined to bed, house and prison cell and has required medicines and medical attention and has been prevented and will be prevented from pursuing her usual ordinary vocation and has expended or incurred large sums for legal representation and medical attention and will be required to expend and incur further sums for legal representation and for medical and other attention.

36. That by reason of the foregoing, the plaintiff, ROBIN FORD, was damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction

WHEREFORE, plaintiff, ROBIN FORD, demands judgment against the defendants in the First, Second and Third Causes of Action in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction, all together with the costs and disbursements of this action.

Dated: New York, New York
June 6, 2014

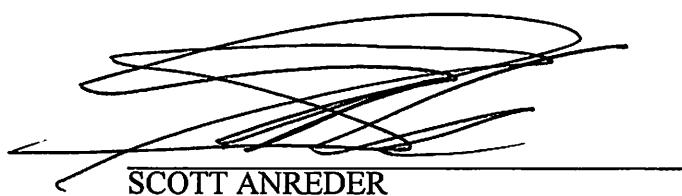
Yours, etc.

SCOTT ANREDER
ANREDER & GEORGE, ESQS.
Attorneys for plaintiff
143 West 29th Street.
Suite 1104
New York, New York 10001
(212) 967- 2011

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss

I, the undersigned, an attorney admitted to practice in the courts of New York State, state under penalty of perjury that I am the attorney for the plaintiff in the within action; I have read the foregoing SUMMONS and COMPLAINT and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe to be true. The reason this verification is made by me and not by my client, is that my client is not presently in the county where I maintain my offices. The grounds of my belief as to all matters not stated upon my own knowledge are the materials in my file and the investigations conducted by my office.

Dated: New York, New York
June 6, 2014



A handwritten signature in black ink, appearing to read "SCOTT ANREDER". The signature is written over a horizontal line and includes a stylized flourish at the top.

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

ROBIN FORD,

Plaintiff(s),

-against-

THE CITY OF NEW YORK and NEW YORK CITY
POLICE DEPARTMENT,

Defendant(s)

X

X

SUMMONS AND VERIFIED COMPLAINT

X

LAW OFFICES OF ANREDER & GEORGE

Attorney for Plaintiff

Office and Post Office Address, Telephone

143 West 29th Street

Suite 1104

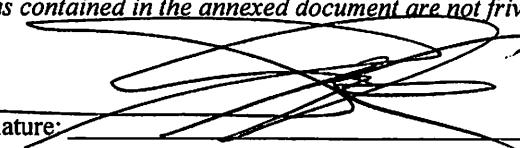
New York, New York 10001

(212) 967-2011

X

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated: June 6, 2014


Signature:

Print Signer's Name: SCOTT ANREDER, ESQ.